

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

WOODBIDGE GROUP OF COMPANIES, LLC,
et al.,¹

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of
the Woodbridge Liquidation Trust, successor in
interest to the estates of WOODBRIDGE GROUP OF
COMPANIES, LLC, *et al.*,

Plaintiff,

vs.

IRA SERVICES TRUST COMPANY, CUSTODIAN
FOR THE BENEFIT OF SHUANG HUO IRA;
SHUANG HUO,

Defendants.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adversary Proceeding
Case No. 19-50592 (BLS)

PLAINTIFF’S REQUEST FOR ENTRY OF DEFAULT JUDGMENT

Plaintiff, Michael Goldberg, in his capacity as Liquidating Trustee of the Woodbridge Liquidation Trust (the “Plaintiff”) has requested entry of default against defendants IRA Services Trust Company, custodian for the benefit of Shuang Huo IRA, and Shuang Huo (each a “Defendant,” and collectively, the “Defendants”) in the above-captioned adversary proceeding.

Plaintiff requests that a default judgment in the amount of \$105,080.33 plus \$350.00 in Court costs be entered based on (a) the Entry of Default against Defendant, (b) the details of the Affidavit of Counsel in Support of Plaintiff’s Request for Entry of Default (the “Affidavit”), and (c) the Complaint for Avoidance and Recovery of Fraudulent Transfers Pursuant to 11 U.S.C.

¹ The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

Sections 544, 548, & 550, with the accompanying Summons and Certificate of Service, attached to the Affidavit as Exhibit A. A form of Entry of Default Judgment is attached hereto as **Exhibit A**.

PACHULSKI, STANG, ZIEHL & JONES LLP

Dated: February 4, 2021

/s/ Colin R. Robinson

Bradford J. Sandler (DE Bar No. 4142)
Andrew W. Caine (CA Bar No. 110345)
Colin R. Robinson (DE Bar No. 5524)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
acaine@pszjlaw.com
crobinson@pszjlaw.com

*Counsel to Plaintiff Michael Goldberg, in his
capacity as Liquidating Trustee of the Woodbridge
Liquidation Trust*